

EXHIBIT B

MARIE WEST V. KELLY BURCH
DREW EDMONDSON

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IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA

MARIE KATHLEEN WEST,

Plaintiff,

VS.

CASE No. CIV-03-1019-L

KELLY HUNTER BURCH, in
her individual capacity;

TOM GRUBER, in his
individual capacity;

DREW EDMONDSON, in his
official capacity; and

THE STATE OF OKLAHOMA,
ex rel., THE OFFICE OF

THE ATTORNEY GENERAL, a
constitutional state

agency,

Defendants.

DEPOSITION OF ATTORNEY GENERAL W. A. DREW EDMONDSON

TAKEN ON BEHALF OF THE PLAINTIFF

ON OCTOBER 11, 2004

IN OKLAHOMA CITY, OKLAHOMA

ORIGINAL

CITY REPORTERS, INC.
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1 A Again, I had discussions with Ed Fite, and
2 I'm sure Marie West came up during some of those
3 discussions. Whether we specificity talked about any
4 of the allegations, I don't recall and, frankly,
5 doubt.

6 Q What was the status of your poultry
7 negotiations as of October 2002?

8 A At that point in time, we would have still
9 been attempting to negotiate with the poultry
10 industry and I think, at that point in time, had
11 actually made some headway with the municipalities.

12 It was ongoing.

13 Q Was that a matter that you wanted to
14 specifically handle yourself, as opposed to other
15 persons being involved in those negotiations?

16 A In terms of negotiations themselves, I
17 thought it critical that the State of Oklahoma speak
18 with one voice, and, according to the State Supreme
19 Court, that's us.

20 Even if it involves a number of different
21 state agencies, if we're talking about litigation or
22 potential litigation, the Attorney General's office
23 speaks for the State of Oklahoma.

24 And it can be damaging to your cause to
25 have the DEQ saying one thing and Scenic Rivers

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1 saying something else and that may or may not be the
2 position of the State, as enunciated by the Attorney
3 General.

4 So, yes, I did want our office to be
5 handling the negotiations.

6 Q Specifically, in your office, did you
7 delegate that to any particular person or persons, or
8 was that something you wanted to do personally?

9 A I wanted to be involved in some of the
10 discussions with the poultry industry and did attend
11 several of the meetings.

12 But overall responsibility for the
13 negotiations rested with the chief of the unit, and
14 the chief would either handle it personally or
15 delegate it.

16 Q And that would be Kelly Hunter Burch?

17 A That would be Kelly Hunter Burch.

18 Q Did you know whether the Conservation
19 Commission took any kind of a position contrary to
20 that that you were advancing from your office?

21 A Not specifically, no.

22 Q Would the same be true with the Scenic
23 Rivers Commission?

24 A I think the same would be true in terms of
25 each of the agencies when I speak of specificity.